

FILED

2008 JAN 23 PM 2:28

U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

BY ENIX DEPUTY

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

January 2007 Grand Jury

08 CR 0213

LAB

UNITED STATES OF AMERICA,

Plaintiff,

v.

RICHARD SILLS, JR.,

Defendant.

Case No. _____

I N D I C T M E N T

Title 18, U.S.C., Sec. 1038(a)(1)-
False Information and Hoaxes
(Felony); Title 18, U.S.C.,
Sec. 844(e) - Bomb Threat by
Telephone (Felony)

The grand jury charges:

Count 1

On or about December 5, 2007, within the Southern District of California, defendant RICHARD SILLS, JR., knowingly conveyed false and misleading information under circumstances where such information may reasonably be believed and where such information indicates that an activity has taken, is taking, and will take place, that would constitute the use, and threat to use, a destructive device, a violation of Title 18, United States Code, Chapter 113B, to wit, defendant placed a telephone call to the University of California, San Diego stating: "You need to take this very seriously - there is a bomb in Leichtag"; all in violation of Title 18, United States Code, Section 1038(a)(1), a felony.

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PJM:em:San Diego
1/22/08

Count 2

On or about December 5, 2007, within the Southern District of California, defendant RICHARD SILLS, JR., through the use of a telephone, did wilfully make a threat to kill, injure and intimidate individuals and unlawfully to damage and destroy buildings, vehicles, real property and personal property by means of an explosive, to wit, defendant placed a telephone call to the University of California, San Diego stating: "You need to take this very seriously - there is a bomb in Leichtag"; in violation of Title 18, United States Code, Section 844(e), a felony.

Count 3

On or about December 5, 2007, within the Southern District of California, defendant RICHARD SILLS, JR., knowingly conveyed false and misleading information under circumstances where such information may reasonably be believed and where such information indicates that an activity has taken, is taking, or will take place, that would constitute the use, or threat to use, a destructive device, a violation of Title 18, United States Code, Chapter 113B, to wit, defendant placed a telephone call to the University of California, San Diego stating: "Take this very seriously, there is a bomb in the Leichtag Building, take this very seriously"; all in violation of Title 18, United States Code, Section 1038(a)(1), a felony.

Count 4

On or about December 5, 2007, within the Southern District of California, defendant RICHARD SILLS, JR., through the use of a telephone, did wilfully make a threat to kill, injure and intimidate individuals and unlawfully to damage and destroy buildings, vehicles, real property and personal property by means of an explosive, to wit,

1 defendant placed a telephone call to the University of California, San
2 Diego stating: "Take this very seriously, there is a bomb in the
3 Leichtag Building, take this very seriously"; in violation of
4 Title 18, United States Code, Section 844(e), a felony.

5 Count 5

6 On or about December 5, 2007, within the Southern District of
7 California, defendant RICHARD SILLS, JR., knowingly conveyed false and
8 misleading information under circumstances where such information may
9 reasonably be believed and where such information indicates that an
10 activity has taken, is taking, or will take place that would
11 constitute the use, or threat to use, a destructive device, a
12 violation of Title 18, United States Code, Chapter 113B, to wit,
13 defendant sent a letter to the University of California, San Diego's
14 Police Department that stated that remote controlled explosive devices
15 had been placed in six campus buildings, including the "Leichstag
16 [sic] Research Building," and that the devices would be detonated
17 unless animals from campus research facilities were released; all in
18 violation of Title 18, United States Code, Section 1038(a)(1), a
19 felony.

20 DATED: January 23, 2008.

21 A TRUE BILL:

22 
23 Foreperson

24 KAREN P. HEWITT
25 United States Attorney

26 By: 
27 PETER J. MAZZA
28 Assistant U.S. Attorney